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SEP 2 3 2004

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September 20, 2004

MAILSCOP MISSING PARTS Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

Re:

Daniel PARTLOW et al.

U.S. Patent Application No. 10/751,086 Filed: January 2, 2004 Attorney Docket No. PARTLOW2 Confirmation No. 2155

"SYSTEM, METHOD AND COMPUTER PROGRAM FOR CREATING AND

VALUING FINANCIAL INSTRUMENTS LINKED TO AVERAGE CREDIT SPREADS"

SIR:

We enclose herewith:

[X] Petition for Extension of Time;

[X] Copy of Notice to File Missing Parts;

[X] Copy of Complete Application as filed on January 2, 2004, including Specification (76 p), Claims (4 p), Abstract (2 p) and Drawings (6 p)

[X] Declaration;

[X] Petition for Original Filing Date;

[X] Fee Transmittal Form;

[X] Check for \$250.00 (See Fee Transmittal Form);

[X] Acknowledgment Postcard.

The Commissioner is hereby authorized to charge payment of the fees associated with this communication or credit any overpayment to Deposit Account No. 08-0570.

The applicants hereby petition under 37 CFR 1.136 or other applicable rule to have the response period extended the number of months necessary to render the attached communication timely if a petition is required.

Respectfully submitted,

Anthony H. Handal

Reg. No. 26,275

Roger Pitt

Reg. No. 46,996

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope, postage prepaid, addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on September 20, 2004.

Anthony H. Handal Reg. No. 26,275 Roger Pitt Reg. No. 46,996